

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CAPITOL RECORDS, INC., a Delaware corporation,	X	
)	ECF Case
)	07-cv-6488 (LTS) (KNF)
Plaintiff,)	
- v -)	MOTION TO WITHDRAW
)	AS COUNSEL
CITY HALL RECORDS, INC., a California corporation and ROBIN COHN,)	
Defendants.)	
	X	

PURSUANT TO RULE 1.4 of the Local Rules of the United States District Courts for the Southern District of New York, I, Michael Kelleher, hereby move for an Order granting Folger Levin & Kahn LLP leave to withdraw as counsel for Defendants City Hall Records, Inc. and Robin Cohn in the above captioned matter.

Dated: New York, New York
March 10, 2008

FOLGER LEVIN & KAHN LLP

Michael Kelleher
Michael Kelleher
275 Battery Street
23rd Floor
San Francisco, California 94111
Tel. 415-365-7813

Sworn to before me this
10th day of March, 2008

Notary Public

JURAT

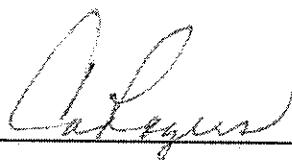
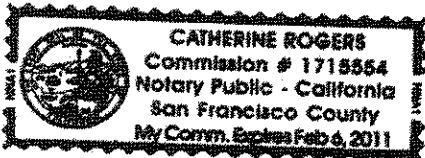
STATE OF CALIFORNIA)
COUNTY OF SAN FRANCISCO)

Subscribed and sworn to (or affirmed) before me on this 6th day of March, 2008, by Michael F. Kelleher, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

(seal)

Notary Public:



A handwritten signature of Catherine Rogers in black ink, followed by a horizontal line for her name.

Catherine Rogers

Description of Attached Document

Title or Type of Document: Motion to Withdraw as Counsel

Document Date: Thursday, March 06, 2008 No. of Pages: 1

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CAPITOL RECORDS, INC., a Delaware corporation,	X
Plaintiff,) ECF Case
) 07-cv-6488 (LTS) (KNF)
- v -) Local Rule 1.4 AFFIDAVIT
CITY HALL RECORDS, INC., a California corporation and ROBIN COHN,)
Defendants.) X

STATE OF CALIFORNIA)
ss.:
COUNTY OF San Francisco)

Michael Kelleher, being duly sworn, deposes and says:

1. I am a partner in the law firm of Folger Levin & Kahn LLP, outgoing counsel for defendants City Hall Records, Inc., and Robin Cohn, and I make this affidavit pursuant to Local Civil Rule 1.4 on behalf of my law firm for permission to withdraw as counsel in this action.
2. The reason my firm seeks to withdraw as counsel is because City Hall Records, Inc., and Robin Cohn have chosen to consolidate the defense of this action with the firm of Lewis Brisbois Bisgaard & Smith, LLP, presently local counsel of record for City Hall Records, Inc. and Robin Cohn, particularly as the matter is being litigated in New York, where Lewis Brisbois & Bisgaard, LLP has offices.
3. Lewis Brisbois Bisgaard & Smith, LLP, will continue to represent defendants City Hall Records, Inc. and Robin Cohn in this action and will continue to be attorneys of record.
4. Upon information and belief, no prejudice or delay will result from my firm's withdrawal as counsel.

WHEREFORE, it is respectfully requested that the Court grant the withdrawal of Folger Levin & Kahn LLP, as attorney of record, for defendants City Hall Records, Inc. and Robin Cohn.

Dated: New York, New York
March 10, 2008


Michael Kelleher

Sworn to before me this 10th day
of March, 2008.



Notary Public

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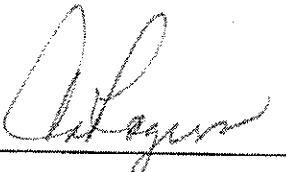
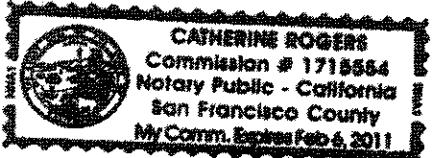
STATE OF CALIFORNIA)
COUNTY OF SAN FRANCISCO)

Subscribed and sworn to (or affirmed) before me on this 6th day of March, 2008, by Michael F. Kelleher, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

(seal)

Notary Public:



A handwritten signature of Catherine Rogers in black ink, followed by a horizontal line for her name.

Catherine Rogers

Description of Attached Document

Title or Type of Document: Local Rule 1.4 Affidavit

Document Date: Thursday, March 06, 2008 No. of Pages: 2

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
CAPITOL RECORDS, INC., a Delaware corporation,)
Plaintiff,) ECF Case
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- v -)
CITY HALL RECORDS, INC., a California corporation)
and ROBIN COHN,)
Defendants.)
-----	X

**CONSENT TO
WITHDRAW AS
COUNSEL**

IT IS HEREBY CONSENTED that Folger Levin & Kahn LLP, withdraw as attorneys of record for Defendants City Hall Records, Inc. and Robin Cohn. Jura C. Zibas and Joanne J. Romero of Lewis Brisbois Bisgaard & Smith LLP, will remain as counsel of record.

Facsimile signatures shall be deemed originals for purposes of this Consent, and the parties agree that the Consent may be filed with the Court with such facsimile signatures.

Respectfully submitted,

FOLGER LEVIN & KAHN LLP


Michael Kelleher

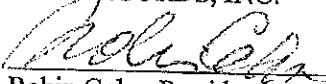

Kevin O'Brien

Defendants City Hall Records, Inc. and Robin Cohn consent to this withdrawal.

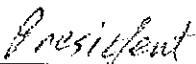


Robin Cohn

CITY HALL RECORDS, INC.

By: 

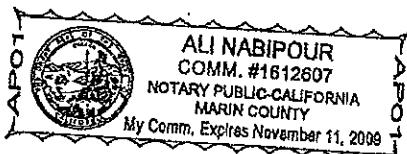
Robin Cohn, President

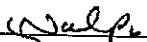
Its: 

President

STATE OF CALIFORNIA)
COUNTY OF Marin)ss.:

On the 07 day of March, 2008, before me personally came Robin Cohn, to me known to be the same person described in and who executed for the foregoing consent and acknowledged to me that (s)he executed the same.





Notary Public

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CAPITOL RECORDS, INC., a Delaware corporation,) ECF Case
) 07-cv-6488 (LTS) (KNF)
Plaintiff,)
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- v -)
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CITY HALL RECORDS, INC., a California corporation)
and ROBIN COHN,)
)
Defendants.)
----- X

ORDER

Upon the motion by Michael Kelleher of Folger Levin & Kahn LLP seeking leave for Folger Levin & Kahn LLP to withdraw as counsel and upon the supporting affidavit and consent to withdraw as counsel;

IT IS HEREBY ORDERED THAT: Folger Levin & Kahn LLP is granted leave to withdraw as counsel for Defendants in the above captioned case in the United States District Court for the Southern District of New York.

Dated: New York, New York
March ___, 2008

So Ordered:

Hon. Laura Taylor Swain, U.S.D.J.